

Serial No.: 10/611,509
Docket No.: 60655.1300

REMARKS

Applicants reply to the Office Action dated November 17, 2005, within the shortened three month statutory period for reply. Claims 6-15 were pending in the application and the Examiner rejects claims 6-15. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of the application is respectfully requested.

Rejection under 35 U.S.C. § 102(b)

The Examiner rejects claims 6 and 9-15 under 35 U.S.C. § 102(b) as being anticipated by Liaguno et al., U.S. Patent No 5,729,741 ("Liaguno"). Applicants respectfully traverse this rejection.

Liaguno generally discloses a system for storing various forms of media along with transcriptions. The transcriptions enable a user to search for phrases or keywords within the transcript in order to locate pertinent audio, video or document scans. Liaguno is limited to the use of optical character recognition (OCR) to create a textual version of a scanned document. Liaguno is also limited to utilizing voice recognition (VR) technology to create textual transcripts of audio and video content. The transcribed documents, audio portion and video portion are stored with their respective digitized format within a computer memory structure.

In the "Response to Arguments" of the present action, with regard to the previously filed amendment to claim 6 where Applicants sought to clarify the direct conversion of binary to text, the Examiner states that, "[a]lthough Liaguno's OCR and VR conversion may be more processor intensive, and therefore take longer, it is still considered "direct" conversion because there is no intermediary format between the binary content and the text content during conversion" (page 7, paragraph 1).

The Liaguno system constructs a textual representation of digital files based on a series of comparisons performed by computing logic which does not result in a direct conversion of binary data to its ASCII equivalent to create text data. As those skilled in the art would immediately appreciate, it is an important distinction that OCR and VR are extremely processor intensive, require specialized hardware and software, and are not 100% accurate. As such, Liaguno does not disclose or suggest at least "converting each binary set of said binary content directly into each corresponding ASCII value to form text content," as recited by independent claim 6.

Claims 7-15 variously depend from independent claim 6, therefore dependent claims 7-15 are differentiated from the cited reference for at least the same reasons as set forth above, as well as in view of their own respective features.

AXP No. TH200314099

1784877.2

Serial No.: 10/611,509
Docket No.: 60655.1300

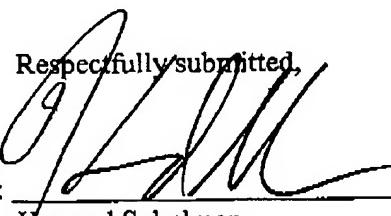
Rejection under 35 U.S.C. § 103(a)

The Examiner rejects claims 7 and 8 under 35 U.S.C. § 103(a) as being unpatentable over Liaguno in view of Anderson, et al., U.S. Patent No. 5,799,310 ("Anderson"). Applicants respectfully traverse this rejection.

The Examiner correctly notes that "Liaguno does not explicitly store said binary content as a binary large object (BLOB) or said text content as a character large object (CLOB) as claimed" (page 5, item 4). The Examiner asserts that Anderson discloses a system and method similar to that of Liaguno, wherein binary content is stored as a BLOB in one field of a database record, while corresponding text content is stored as a CLOB in another field of the database" (page 5-6, item 6).

Anderson discloses extenders for a relational database, wherein the extenders comprise dedicated table columns for describing and relating complex objects. Anderson generally discloses storing a BLOB in a hidden table field or providing a reference within a table field that point to a BLOB file. In addition to the Anderson disclosure, the ability to store a CLOB is an inherent property of most databases systems. However, neither Liaguno, Anderson, nor any combination thereof, disclose or suggest at least "converting each binary set of said binary content directly into each corresponding ASCII value to form text content," as recited by independent claim 6 from which dependent claims 7 and 8 depend.

Applicants respectfully submit that the pending claims are in condition for allowance. The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Office to telephone the undersigned if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,

By: _____
Howard Sobelman
Reg. No. 39,038

Dated: February 8, 2006

SNELL & WILMER L.L.P.
400 E. Van Buren
One Arizona Center
Phoenix, Arizona 85004
Phone: 602-382-6228
Fax: 602-382-6070
Email: hsobelman@swlaw.com

AXP No. TH200314099
1784877.2